

# EXHIBIT B

## Everdell, Abigail

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**From:** KEANE, JACLYN <JACLYN.KEANE@nypd.org>  
**Sent:** Friday, March 28, 2025 4:03 PM  
**To:** Farley, Kathleen; Everdell, Abigail; Andrew Brunsden; Zimmerman, Tobias (Law); Nelson, Genevieve (Law); Smith-Williams, Qiana (Law); GERBER, MICHAEL; Stephen Mc Quade; AG-NYPLitigation; Payne Litigation Team; rolonlegalteam@aboushi.com; Faux, Meghan; Marykate Acquisto; Andrew Quinn; rolon@femmelaw.com; CALLAGHAN, PETER; ALBANESE, SAMANTHA  
**Cc:** Gray Legal Team-External; Jeanene Barrett; Jocelyn Strauber; Priya Raghavan  
**Subject:** Re: In Re 2020 Protests: Final Versions of Press Policies and Trainings  
**Attachments:** Updated Press Lesson Plan.docx; Media\_Press\_Powerpoint.pptx; NYPDU Media\_Press.docx; Final Draft Day 1 Module 8 1.22.2025 - edited.docx; PG 212-49.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

[EXTERNAL]

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Afternoon all,

Please find the attached press training documents. As well as, the below brief explanation as to our acceptance/altering the training. I believe Tobias sent out our availability for next week. Have a nice weekend.

- PFAA Module 8, "Interactions with the Press," sent to Plaintiffs on December 15, 2025 - **accepted revisions.**
- NYPDU Media Script, sent to Plaintiffs on January 6, 2025 - **We are not adding description of the roles for Desk Officers/Platoon Commander**
- Updated Press Lesson Plan, sent to Plaintiffs on January 9, 2025 - **We are not adding description of the roles for Desk Officers/Platoon Commander**
- Media Press PowerPoint, sent to Plaintiffs on January 15, 2025 - **We are not adding description of the roles for Desk Officers/Platoon Commander**
- Updated Press Questions, sent to Plaintiffs on January 9, 2025 - **adjusted for revisions.**
- Revised Patrol Guide provision 212-49, "Incidents Involving Media Representatives," sent to Plaintiffs on January 15, 2025 - **We are keeping the word "will," as our reading of paragraph 89(g) is non-MOME press holders need to leave the area but can be close enough to record. Red Light/Green Light is only during FAAs and does not apply across the board to members of the press in all PD encounters.**

Jaclyn M. Keane, Esq.  
Deputy Inspector  
Legal Bureau-Executive Officer  
1 Police Plaza

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**From:** Farley, Kathleen <KathleenFarley@dwt.com>

**Sent:** Thursday, March 27, 2025 14:41

**To:** KEANE, JACLYN <JACLYN.KEANE@nypd.org>; Everdell, Abigail <AbigailEverdell@dwt.com>; Andrew Brunsten <abrunsten@doi.nyc.gov>; Zimmerman, Tobias (Law) <tzimmerm@law.nyc.gov>; Nelson, Genevieve (Law) <gnelson@law.nyc.gov>; Smith-Williams, Qiana (Law) <qwilliam@law.nyc.gov>; GERBER, MICHAEL <MICHAEL.GERBER@nypd.org>; Stephen Mc Quade <SMcQuade@pittalaw.com>; AG-NYPDLitigation <AG.NYPDLitigation@ag.ny.gov>; Payne Litigation Team <PayneLitigationTeam@nyclu.org>; rolonlegalteam@aboushi.com <rolonlegalteam@aboushi.com>; Faux, Meghan <Meghan.Faux@ag.ny.gov>; Marykate Acquisto <macquisto@quinnlawny.com>; Andrew Quinn <aquinn@quinnlawny.com>; rolon@femmelaw.com <rolon@femmelaw.com>; CALLAGHAN, PETER <PETER.CALLAGHAN@nypd.org>; ALBANESE, SAMANTHA <SAMANTHA.ALBANESE@nypd.org>

**Cc:** Gray Legal Team-External <GrayLegalTeam@dwt.com>; Jeanene Barrett <JBarrett@doi.nyc.gov>; Jocelyn Strauber <JStrauber@doi.nyc.gov>; Priya Raghavan <PRaghavan@doi.nyc.gov>

**Subject:** RE: In Re 2020 Protests: Final Versions of Press Policies and Trainings

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We understand that you are still reviewing the proposal. Given that Section 101(c) of the settlement agreement specifies that a meet-and-confer should be scheduled with 14 days of receipt of recommendations, we would like to schedule this meeting as soon as possible. Please let us know your availability next week. Thank you.

**Kathleen Farley**

Associate, Davis Wright Tremaine LLP

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**From:** KEANE, JACLYN <JACLYN.KEANE@nypd.org>

**Sent:** Tuesday, March 25, 2025 12:28 PM

**To:** Farley, Kathleen <KathleenFarley@dwt.com>; Everdell, Abigail <AbigailEverdell@dwt.com>; Andrew Brunsten <abrunsten@doi.nyc.gov>; Zimmerman, Tobias (Law) <tzimmerm@law.nyc.gov>; Nelson, Genevieve (Law) <gnelson@law.nyc.gov>; Smith-Williams, Qiana (Law) <qwilliam@law.nyc.gov>; GERBER, MICHAEL <MICHAEL.GERBER@nypd.org>; Stephen Mc Quade <SMcQuade@pittalaw.com>; AG-NYPDLitigation <AG.NYPDLitigation@ag.ny.gov>; Payne Litigation Team <PayneLitigationTeam@nyclu.org>; rolonlegalteam@aboushi.com; Faux, Meghan <Meghan.Faux@ag.ny.gov>; Marykate Acquisto <macquisto@quinnlawny.com>; Andrew Quinn <aquinn@quinnlawny.com>; rolon@femmelaw.com; CALLAGHAN, PETER <PETER.CALLAGHAN@nypd.org>; ALBANESE, SAMANTHA <SAMANTHA.ALBANESE@nypd.org>

**Cc:** Gray Legal Team-External <GrayLegalTeam@dwt.com>; Jeanene Barrett <JBarrett@doi.nyc.gov>; Jocelyn Strauber <JStrauber@doi.nyc.gov>; Priya Raghavan <PRaghavan@doi.nyc.gov>

**Subject:** Re: In Re 2020 Protests: Final Versions of Press Policies and Trainings

[EXTERNAL]

No, we are still reviewing the edits. There will be a written response, as there has been for every other training/policy revisions, as to what we have rejected or accepted. Thank you.

**From:** Farley, Kathleen <KathleenFarley@dwt.com>

**Sent:** Tuesday, March 25, 2025 12:22

**To:** Everdell, Abigail <AbigailEverdell@dwt.com>; Andrew Brunsten <abrunsten@doi.nyc.gov>; Zimmerman, Tobias (Law) <tzimmerm@law.nyc.gov>; KEANE, JACLYN <JACLYN.KEANE@nypd.org>; Nelson, Genevieve (Law) <gnelson@law.nyc.gov>; Smith-Williams, Qiana (Law) <qwilliam@law.nyc.gov>; GERBER, MICHAEL <MICHAEL.GERBER@nypd.org>; Stephen Mc Quade <SMcQuade@pittalaw.com>; AG-NYPDLitigation <AG.NYPDLitigation@ag.ny.gov>; Payne Litigation Team <PayneLitigationTeam@nyclu.org>; rolonlegalteam@aboushi.com <rolonlegalteam@aboushi.com>; Faux, Meghan <Meghan.Faux@ag.ny.gov>; Marykate Acquisto <macquisto@quinnlawny.com>; Andrew Quinn <aquinn@quinnlawny.com>; rolon@femmelaw.com <rolon@femmelaw.com>; CALLAGHAN, PETER <PETER.CALLAGHAN@nypd.org>; ALBANESE, SAMANTHA <SAMANTHA.ALBANESE@nypd.org>

**Cc:** Gray Legal Team-External <GrayLegalTeam@dwt.com>; Jeanene Barrett <JBarrett@doi.nyc.gov>; Jocelyn Strauber <JStrauber@doi.nyc.gov>; Priya Raghavan <PRaghavan@doi.nyc.gov>

**Subject:** RE: In Re 2020 Protests: Final Versions of Press Policies and Trainings

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Tobias,

As we have not received any invitation for a meet-and-confer regarding the policy and training revisions proposed in the chain below, we infer that you plan to incorporate our suggestions. Please confirm our understanding. Thank you.

### Kathleen Farley

Associate, Davis Wright Tremaine LLP

P 212.402.4076 E [kathleenfarley@dwt.com](mailto:kathleenfarley@dwt.com)

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**From:** Everdell, Abigail <AbigailEverdell@dwt.com>

**Sent:** Monday, March 10, 2025 12:13 PM

**To:** Zimmerman, Tobias (Law) <tzimmerm@law.nyc.gov>; JACLYN.KEANE <JACLYN.KEANE@nypd.org>; Nelson, Genevieve (Law) <gnelson@law.nyc.gov>; Smith-Williams, Qiana (Law) <qwilliam@law.nyc.gov>; GERBER, MICHAEL <MICHAEL.GERBER@nypd.org>; Stephen Mc Quade <SMcQuade@pittalaw.com>; AG-NYPDLitigation <AG.NYPDLitigation@ag.ny.gov>; Payne Litigation Team <PayneLitigationTeam@nyclu.org>; rolonlegalteam@aboushi.com <rolonlegalteam@aboushi.com>; Faux, Meghan <Meghan.Faux@ag.ny.gov>; Marykate Acquisto <macquisto@quinnlawny.com>; Andrew Quinn <aquinn@quinnlawny.com>; rolon@femmelaw.com <rolon@femmelaw.com>; CALLAGHAN, PETER <PETER.CALLAGHAN@nypd.org>; ALBANESE, SAMANTHA <SAMANTHA.ALBANESE@nypd.org>

**Cc:** Gray Legal Team-External <GrayLegalTeam@dwt.com>; Jeanene Barrett <JBarrett@doi.nyc.gov>; Jocelyn Strauber <JStrauber@doi.nyc.gov>; Andrew Brunsten <abrunsten@doi.nyc.gov>

**Subject:** [EXTERNAL] In Re 2020 Protests: Final Versions of Press Policies and Trainings

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Tobias,

Please find attached a letter responding to drafts of the following policy and training documents produced to us, as well as attachments showing redline comments on these policy and training documents:

- PFAA Module 8, "Interactions with the Press," sent to Plaintiffs on December 15, 2025
- NYPDFU Media Script, sent to Plaintiffs on January 6, 2025
- Updated Press Lesson Plan, sent to Plaintiffs on January 9, 2025
- Media Press PowerPoint, sent to Plaintiffs on January 15, 2025
- Updated Press Questions, sent to Plaintiffs on January 9, 2025
- Revised Patrol Guide provision 212-49, "Incidents Involving Media Representatives," sent to Plaintiffs on January 15, 2025

Please confirm no later than March 24 that our recommended revisions will be incorporated into the final policies and trainings, and please re-produce the final policies once the relevant language has been amended and/or added. If the revisions will not be adopted and incorporated, please advise if and on what date you are willing to meet and confer.

Best,  
Abigail

**Abigail Everdell**  
Counsel, Davis Wright Tremaine LLP

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